



August 1, 2022

Ms. Jane Marshall
Director
Division of Decommissioning, Uranium Recovery, and Waste Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Re: Resubmission - License Application for a Performance-Based, Multi-Site License, High-Pressure Slurry Ablation (HPSA), Disa Technologies, Inc., Casper, Wyoming

Dear Ms. Marshall:

Disa Technologies, Inc. (Disa) is pleased to resubmit its application to the U.S. Nuclear Regulatory Commission (NRC) staff for a Performance-Based, Multi-Site license to use its High-Pressure Slurry Ablation (HPSA) to remediate mine waste rock piles and other contaminated sites. This resubmission eliminates Sensitive Unclassified Nonsafeguards Information (SUNSI) inadvertently submitted on July 13, 2022. Disa intends to use HPSA by mobilizing the equipment to a site, treating waste rock or other contaminated materials, transporting isolated source material offsite for disposal or for use as alternate feed, and demobilizing the equipment for use at other sites. Disa will manage and handle source material, but possession of the source material will remain with the site owners.

Contents of this application includes:

- Executed Application for Materials License (Form 313)
- Executed Application Technical Report
- Environmental Report

As discussed during our public meeting of May 23, 2022, Disa's HPSA equipment will leave behind a sandy material (a.k.a. clean coarse fraction) that is proven to be safe through sampling, analysis, and dose modeling. This result demonstrates a clear advantage of HPSA over other technologies; HPSA accomplishes waste minimization by producing a reusable sand product. For those clients who choose to, the isolated mineral fraction, which contains constituents of concern along with RCRA metals and vanadium, may be transported to a licensed uranium recovery facility for use as an alternate feed (which provides further waste minimization).

Disa understands that this license application presents a novel technology that requires a thorough review by the Division of Decommissioning, Uranium Recovery, and Waste Programs. However, other Federal agencies have expressed a significant interest in Disa's HPSA; therefore, time is of the essence. Disa needs a decision regarding this application by January 2023, to allow

time for Disa to order long, lead-time equipment and execute important remediation projects commencing in 2023. Toward that end, Disa would like to offer a phased licensing strategy that will provide a significant amount of information and data to the NRC staff that undoubtedly will allow the staff to become more comfortable with the full authorization sought in this application.

Disa will agree to a license condition for a temporary authorization that allows for the use of one HPSA unit for a maximum of 90 days. During that 90-day period, Disa will utilize its HPSA equipment to treat approximately 7,500 tons of waste rock. Disa will collect samples for laboratory analysis and prepare a report through Disa's Safety and Environmental Review Panel (SERP). This report will be submitted to the NRC staff for review. Provided that the SERP has confirmed the safety of the HPSA process, after the SERP submits its report, Disa will be entitled to use the full licensing authorization sought by this application. NRC staff and other Federal agency staff will be invited to observe the HPSA operations, as well. Between the observing operations and receiving the SERP report, the NRC will have sufficient information to understand the manner in which HPSA is used for remediation.

We appreciate this opportunity to engage with the NRC staff. If you have any questions, please contact me.

Sincerely,



Greyson Buckingham, CEO
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Attachments: 1. Form 313
2. Application Technical Report
3. Environmental Report